

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUME TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION (NNA/USPS-T18-1)

The United States Postal Service hereby provides the response of witness Hume to the following interrogatory of the National Newspaper Association: NNA/USPS-T18-1, filed on September 17, 1997. The Postal Service did not receive service of this interrogatory, which recently was brought to its attention by another participant.

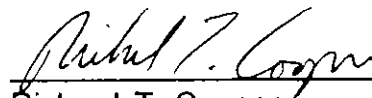
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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October 8, 1997

Response of United States Postal Service Witness Peter Hume
to interrogatory of NNA

NNA/USPS-T18-1

Please explain in your Tables 1-5, line 16 and Tables 6, line 17 what "Publications Service" describes and measures.

Response

The term "Publications Service" was used in my previous testimony, USPS-T-7 of Docket No. MC95-1, to represent the former CRA line item "Second Class Regular Rate" of the former Second Class. See page 32, lines 11-13 of USPS-T-7 and Tables B-1 through B-5 of USPS-T-7B of Docket No. MC95-1. Similarly, "Nonprofit (all categories)" was used in my previous testimony, USPS-T-2 of Docket No. MC96-2, to represent the former CRA line item "Nonprofit Publications" of Second Class. See page 27, lines 4-7 of USPS-T-2 of Docket No. MC96-2. Since I retained the original (MC95-1 and MC96-2) computational formats of all my tables 1-5 in my present testimony, the lines 16 (and line 15 in Table 6) still represent the CRA line items "regular rate publications" or "nonprofit publications" in my Exhibit B tables and Exhibit C tables respectively.

It may be noted that the CCS data collection, which determines cost distributions for city carrier street time and rural carrier components, treats Second Class (periodicals) as a whole without differentiating among the periodicals subclasses.

DECLARATION

I, Peter D. Hume, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Peter D. Hume

Dated:

10/7/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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